COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION



SUBLIC SERVICE

INTERSTATE GAS SUPPLY, INC.'S MOTION TO INTERVENE

James R. Cox COX BOWLING & JOHNSON PLLC 8303 Shelbyville Road Louisville, KY 40222

Phone: 502/423-9998 Fax: 502/423-9946

E-mail: jcox@coxbowlingjohnson.com

Counsel for Petitioner,

INTERSTATE GAS SUPPLY, INC.

Of Counsel:

John W. Bentine, Esq. (0016388) E-Mail: jbentine@cwslaw.com Direct Dial: (614) 334-6121

Bobby Singh, Esq. (0072743) E-Mail: bsingh@cwslaw.com Direct Dial: (614) 334-6122

CHESTER WILLCOX & SAXBE LLP

65 East State Street, Suite 1000 Columbus, Ohio 43215-4213 (614) 221-4000 (main number) (614) 221-4012 (facsimile) General Counsel, Interstate Gas Supply, Inc.: Vincent A. Parisi, Esq. (0073283) Direct Dial: (614) 734-2649

E-Mail: vparisi@igsenergy.com (614) 734-2616 (facsimile)

5020 Bradenton Avenue

Dublin, Ohio 43017

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN	THE	M.	AT	TER	OF:
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THE APPLICATION OF COLUMBIA GAS OF)	
KENTUCKY, INC. TO IMPLEMENT A NEW)	
SMALL VOLUME GAS TRANSPORTATION)	Case No. 2004-00462
SERVICE, A GAS PRICE HEDGING PLAN, AN)	
OFF-SYSTEM SALES AND CAPACITY RELEASE)	
REVENUE SHARING MECHANISM, AND A GAS)	
INCENTIVE MECHANISM)	

INTERSTATE GAS SUPPLY, INC.'S MOTION TO INTERVENE

Now comes Interstate Gas Supply, Inc. ("IGS"), by counsel, and moves for full intervenor status in this action pursuant to 807 KAR 5:001 Section 3(8), to the fullest extent permitted by law, on behalf of itself and the significant number of consumers it serves pursuant to the current small volume transportation program ("Choice Program"). IGS's basis for intervention is that Columbia Gas of Kentucky, Inc.'s ("Columbia") November 30, 2004 application will directly impact IGS, its current Choice Program customers, and potential customers who would have the opportunity for service under the proposed Choice Program.

IGS, the largest competitive supplier in the Choice Program, has been granted full intervenor status in the Columbia's current transportation program case, Case No. 1999-00165. Indeed, as the Commission is aware, IGS has been substantially involved in discussions with Columbia to propose this new pilot program to replace the ongoing pilot program, as well as a permanent Choice Program.

IGS respectfully requests the Commission to expeditiously approve the new proposed Choice Program. Due to the uncertainty associated with the pending termination of the current

Choice Program, IGS has been unable to make additional offers to its current and new customers beyond March 2005. IGS believes that the Commission should install a permanent Choice Program, and that interim approval of this proposed pilot program is appropriate to allow more Kentucky consumers to take advantage of the benefits and opportunities of competitively purchasing their natural gas commodity needs.

WHEREFORE, IGS respectfully requests intervention in the above-captioned matter.

Respectfully submitted,

James R. Cox

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8303 Shelbyville Road Louisville, KY 40222

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Fax: 502/423-9946

E-mail: jcox@coxbowlingjohnson.com

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General Counsel, Interstate Gas Supply, Inc.: Vincent A. Parisi, Esq. (0073283)
Direct Dial: (614) 734-2649

E-Mail: vparisi@igsenergy.com (614) 734-2616 (facsimile) 5020 Bradenton Avenue

Dublin, Ohio 43017

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Interstate Gas Supply, Inc.'s Motion to Intervene was mailed, postage prepaid, on January 18, 2005 to the below listed persons.

Counsel for Petitioner

SERVICE LIST

Stephen B. Seiple
Senior Attorney
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, Ohio 43216-0117
sseiple@nisource.com

Richard S. Taylor Attorney at Law Capital Link Consultants 225 Capital Avenue Frankfort, Kentucky 40601 attysmitty@aol.com

Robi Artman-Hodge MxEnergy Inc. 20 Summer Street Stamford, Connecticut 06901 Dennis Howard Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division Suite 200 1024 Capital Center Drive Frankfort, Kentucky 40601-8204

Leslye M. Bowman
Director of Litigation
David J. Barberie
Corporate Counsel
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, Kentucky 40507

Jack Burch Community Action Council P.O. Box 11610 892 Georgetown Street Lexington, Kentucky 40576